

Sultan School District # 311

Capital Facilities Plan

2020-2025

Adopted: July 27, 2020

Sultan School District No. 311

Capital Facilities Plan

2020-2025

For Inclusion in the
Snohomish County Comprehensive Plan

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Ed Hussman

Kate Roesler

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Mike Varnell

SUPERINTENDENT

Dan Chaplik

For information on the Sultan School District Facilities
Plan contact the Superintendent's Office (360) 793-9800

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Section 1: Introduction

Purpose of the Capital Facilities Plan

The Washington State Growth Management Act (the “GMA”) includes schools in the category of public facilities and services. School districts have adopted capital facilities plans to satisfy the requirements of the GMA and to identify additional school facilities necessary to meet the educational needs of the growing student populations anticipated in their districts.

The Sultan School District (the “District”) has prepared this Capital Facilities Plan (the “CFP”) to provide Snohomish County (the “County”), the City of Sultan (“Sultan”) and the City of Gold Bar (“Gold Bar”) with an overview of projected student enrollment, site capacity, a description of facilities needed to accommodate projected student enrollment, and a schedule and financing program for capital improvements over the next six years (2020-2025).

In accordance with the GMA, adopted County Policy, and adopted school impact fee ordinances of Snohomish County and the cities of Gold Bar and Sultan, the CFP contains the following required elements:

1. Future 6-year enrollment forecasts for each grade span (elementary, middle and high schools).
2. An inventory of existing capital facilities owned by the District showing the locations and capacities of the facilities.
3. A forecast of future needs for capital facilities and school sites.
4. The proposed capacities of expanded or new capital facilities.
5. A six-year plan for financing capital facilities within projected funding capacities, which clearly identifies sources of public money for such purposes. The financing plan separates projects and portions of projects that add capacity from those which do not, since the latter are generally not appropriate for impact fee funding.
6. A calculation of impact fees to be assessed and support data substantiating said fees (if applicable).

In developing this CFP, the District followed the following guidelines set forth in Appendix F of the Snohomish County General Policy Plan:

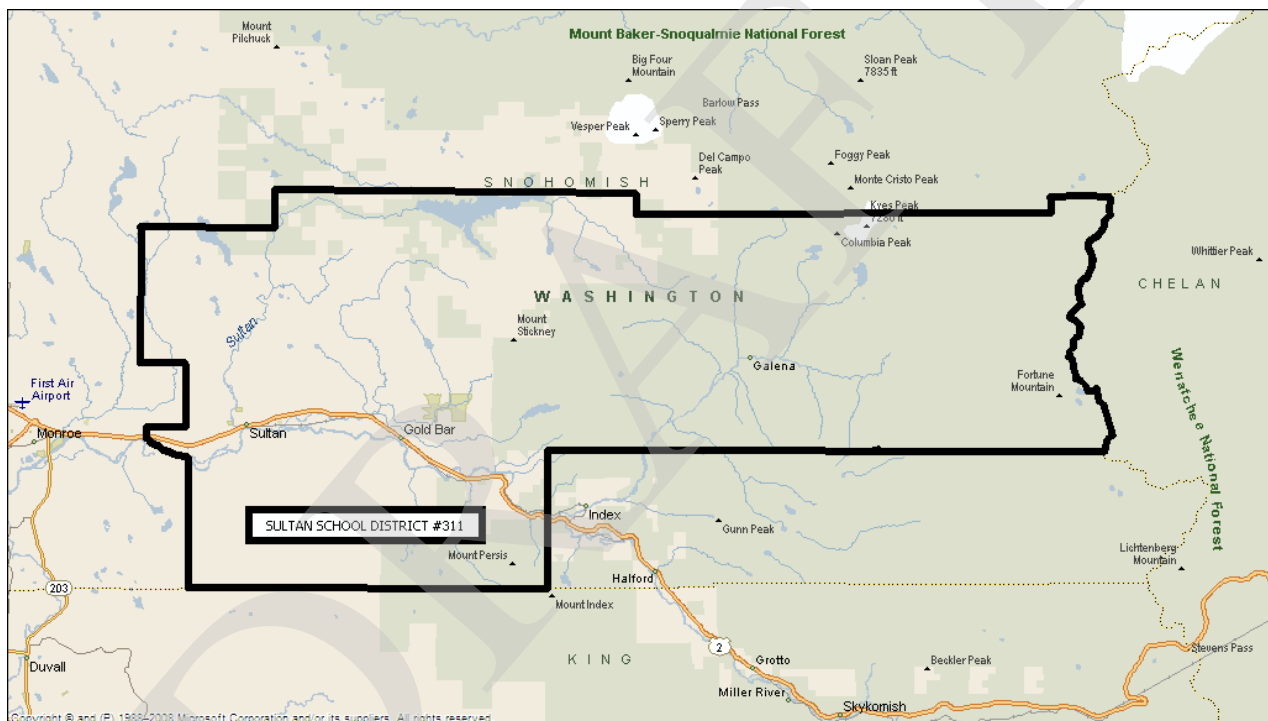
- ❖ Information was obtained from recognized sources, such as the WA State Office of Superintendent of Public Instruction (OSPI), U.S. Census, or other governmental report. School districts may generate their own data if it is derived through statistically reliable methodologies. Information is to be consistent with the Office of Financial Management (“OFM”) population forecasts and those of Snohomish County.
- ❖ The CFP complies with Chapter 36.70A RCW (the Growth Management Act) and, where impact fees are to be assessed, Chapter 82.02 RCW.
- ❖ The calculation methodology for impact fees meets the conditions and tests of Chapter 82.02 RCW. Districts which propose the use of impact fees should identify in future plan updates alternative funding sources in the event that impact fees are not available due to action by the state, county or the cities within their district boundaries.

- ❖ The calculation methodology for impact fees, if proposed by the District, also complies with the criteria and the formulas established by the County and the respective City/Cities.

Snohomish County’s Countywide Planning Policies direct jurisdictions in Snohomish County to “ensure the availability of sufficient land and services for future K-20 school needs.” Policy ED-11. The District appreciates any opportunity for cooperative planning efforts with its jurisdictions.

Overview of the Sultan School District

The Sultan School District has two elementary schools (grades K-5), one middle school (grades 6-8), one high school (grades 9-12) and an alternative high school program. The District serves a student population of approximately 1,981 (October 1, 2019 adjusted FTE enrollment) in all programs from kindergarten through twelfth grade, includes the cities of Sultan and Gold Bar as well as unincorporated rural areas of Snohomish County, and had an estimated population in 2019 of 14,522 residents (Snohomish County 2035 GMA Population Forecast by School District). The District is located 47 miles northeast of Seattle, Washington nestled in the foothills of the Cascade Mountain range.



Section 2: Definitions

Appendix F means Appendix F of the Snohomish County Growth Management Act (GMA) Comprehensive Plan, also referred to as the General Policy Plan (GPP).

Average Assessed Value means the average assessed value by dwelling unit type of all residential units constructed within the Sultan School District.

Board means the Board of Directors of Sultan School District No. 311 (“School Board”).

Capital Facilities means school facilities identified in the District’s CFP.

Construction Cost Allocation means the maximum cost per square foot of construction that the state will recognize. This amount is established by the legislature in the biennium budget. [Formerly referred to as the “Boeckh Index.”]

Development Activity means any residential construction, expansion of a building or structure, or any other change of building, structure or land that creates additional demand and need for school facilities by creating additional dwelling units. This excludes building permits for attached or detached accessory apartments, and remodeling or renovation permits which do not result in additional dwelling units.

Development Approval means any written authorization from the County and/or cities of Sultan or Gold Bar that authorizes the commencement of a residential development activity.

District means Sultan School District No. 311.

District Property Tax Levy Rate means the District’s current capital property tax rate for bonds per thousand dollars of assessed value.

Dwelling Unit Type means (1) single-family residences, (2) multi-family one-bedroom apartment or condominium units and (3) multi-family multiple-bedroom apartment, condominium, or duplex/townhome units, all as defined by local ordinance.

Estimated Facility Construction Cost means the projected costs of new schools or the actual construction costs of schools of the same grade span recently constructed by the District, including on-site and off-site improvement costs.

FTE (Full Time Equivalent) is a means of measuring student enrollment based on the number of hours per day in attendance at District schools. A student is considered one FTE if he/she is enrolled for the equivalent of a full schedule each school day. Sno-Isle Vocational School and college Running Start students are a reduced FTE since they do not attend Sultan High School for a full school day. For purposes of this Capital Facilities Plan, all other grades are considered to contain one FTE per student. Students enrolled in alternative learning experiences (virtual programs) that do not require use of regular school space are counted as an FTE, but not in the “headcount.”

Grade Span means a category into which the District groups its grades of students (e.g., elementary, middle or junior high, and high school).

Growth Management Act / GMA means the Growth Management Act, Chapter 17, Laws of the State of Washington of 1990, 1st Ex. Sess., as now in existence or as hereafter amended.

Headcount total number of students enrolled in the District, regardless of their FTE status. The District must plan to accommodate this many students if they all attended school at the same time.

Interest Rate means the current interest rate as stated in the Bond Buyer Twenty Bond General Obligation Bond Index.

Land Cost Per Acre means the estimated average land acquisition cost per acre (in current dollars) based on recent site acquisition costs, comparisons of comparable site acquisition costs in other districts, or the average assessed value per acre of properties comparable to school sites located within the District.

OFM means Washington State Office of Financial Management.

OSPI means Washington State Office of the Superintendent of Public Instruction.

Permanent Facilities means school facilities of the District with a fixed foundation.

Portables means factory-built structures, transportable in one or more sections, that are designed to be used as instructional spaces and are needed to prevent the overbuilding of school facilities, to meet the needs of service areas within the District, or to cover the gap between the time that families move into new residential developments and the date that construction is completed on permanent school facilities.

Portable Facilities Cost means the total cost incurred by the District for purchasing and installing portable classrooms.

School Impact Fee means a payment of money imposed on residential development as a condition of development approval to pay for school facilities needed to serve new growth and development. The school impact fee does not include a reasonable permit fee, an application fee, the administrative fee for collecting and handling impact fees, or the cost of reviewing independent fee calculations.

Standard of Service means the standard adopted by the District which identifies the program year, the class size by grade span and taking into account the requirements of students with special needs, the number of classrooms, the types of facilities the District believes will best serve its student population, and other factors as identified in the District's Capital Facilities Plan.

State Funding Assistance Percentage means the proportion of funds that are provided to the District for specific capital projects from the state's Common School Construction Fund.

Student Factor [Student Generated Rate/SGR] means the number of students of each grade span (elementary, middle/jr. high, high school) that the District determines are typically generated by different dwelling unit types within the District. The District will use a survey or statistically valid methodology to derive the specific student generated rate.

Teaching Station means a facility space (classroom) specifically dedicated to implementing the District's educational program and capable of accommodating at any one time a full class meeting the District's level of service for the particular grade.

Unhoused Students means students projected to be housed in classrooms where class size exceeds standards within the District and, if the District so specifies in the Capital Facilities Plan, students projected to be housed in portable classrooms.

Section 3: District Standard of Service

Creating a quality educational environment is the first priority of the Sultan School District. School facility and student capacity needs are often dictated by the types and amounts of space required to accommodate the District's adopted educational program. The educational program standards that typically drive facility space needs include grade configuration, optimum facility size, class size, educational program offerings, classroom utilization and scheduling requirements, and use of portable classroom facilities.

Standard of Service for Elementary School Facilities

- Class size for Kindergarten will not exceed an average of 17 students per classroom.
- Class size for 1-3 will not exceed an average of 17 students per classroom.
- Class size for grades 4-5 will not exceed an average of 25 students per classroom.

District Goals for Elementary School Educational Programs

- Educational programs will be provided in a single shift each day. The facility will be available after normal hours for extended learning opportunities and community use.
- Educational programs will be provided on the traditional school year schedule.
- Special education for students may be provided in regular classes when inclusion is possible and in resource rooms or self-contained classrooms when this is the most appropriate option available for some students.
- As a result of scheduling conflicts for student programs, the need for specialized rooms for certain programs, and the need for teachers to have a workspace during planning periods, it is not possible to achieve 100% utilization of all regular teaching stations throughout the day. We have targeted a utilization rate of 90% for grades K-5. Therefore, classroom capacity should be adjusted to reflect the use of one period per day for the aforementioned needs.
- All students will be provided music and physical education in a separate classroom.
- All students will be housed in permanent facilities.
- Optimum design capacity for new elementary schools is 400 students. However, actual capacity of an individual school may vary depending on the educational program offered.

Standard of Service for Secondary School Facilities

- Class size for grades 6-8 will not exceed an average of 25 students per classroom (except PE and Music).
- Class size for grades 9-12 will not exceed an average of 25 students per classroom (except PE and Music).

District Goals for Secondary School Educational Programs

- Educational programs will be provided in a single shift each school day. The facility will be available after normal hours for extra-curricular activities and for extended learning opportunities and community use.

- Educational programs will be provided on a traditional school year schedule.
- As a result of scheduling conflicts for student programs, the need for specialized rooms for certain programs, and the need for teachers to have a workspace during planning periods, it is not possible to achieve 100% utilization of all regular teaching stations throughout the day. We have targeted a utilization rate of 81% for grades 6-12. Therefore, classroom capacity should be adjusted to reflect the use of one period per day for the aforementioned needs.
- Special education for students may be provided in regular classes when inclusion is possible, in resource rooms (pullout model), or in self-contained classrooms when this is the most appropriate option available for some students.
- All students will be housed in permanent facilities.
- Optimum design capacity for a new middle school is 540 students and for a new high school 700 students. However, actual capacity of an individual school may vary depending on the educational program(s) offered.
- Identified students will also be provided other nontraditional educational opportunities in classrooms designated as follows:
 - Vocational/Agricultural Classrooms (i.e., business, wood shop, wood technology, mechanics, metals, and greenhouse plants)
 - Program Specific Classrooms (i.e., music, art, physical education, computer labs, science labs, and business)

District-wide Educational Programs

Special programs offered by the District at specific school sites include:

- ❖ Special Educational Classes for Birth-Three
- ❖ Preschool for Special Needs Students
- ❖ Special Education Classes for K-12
- ❖ Extended Day Kindergarten
- ❖ Speech and Language Therapy
- ❖ Occupational Therapy
- ❖ Physical Therapy
- ❖ School Psychology
- ❖ Drug and Alcohol Intervention
- ❖ Title I / Learning Assistance Programs (LAP)
 - ⊕ Includes Read Naturally Curriculum
- ❖ Title III / Limited English Proficient (LEP)
- ❖ Bilingual Education for English Language Learners (ELL)
- ❖ Technology Education for Grades K-12
- ❖ Advancement Via Individual Determination (AVID)
- ❖ Science Technology Engineering & Math (STEM)
 - ⊕ Includes *Project Lead the Way* Curriculum
- ❖ Summer School / Extended School Year (ESY)
- ❖ Sno-Isle Vocational Skills Center (Cooperative School) for Grades 10-12
- ❖ Community College Running Start for Grades 11-12

- ❖ Vocational and Career Education Onsite for Grades 9-12
- ❖ Alternative Program for Grades 9-12

These special or nontraditional educational programs can have a significant impact on the available student capacity of school facilities. In addition to factors that affect the amount of space required, government mandates and community expectations may affect how classroom space is utilized.

District educational program standards will undoubtedly change in the future as a result of changes in the program year, special programs, class sizes, grade span configurations, and use of new technology, as well as other physical aspects of the school facilities. The school capacity inventory will be reviewed periodically and adjusted as accommodations are made to facilitate the demands brought about by modifications to the educational program standards. These changes will also be reflected in future updates of this Capital Facilities Plan.

Use of Portables

Because of fluctuations in student population as a result of growth from new development and changing age demographics in different parts of the District, portables are used on a temporary basis in most locations. Portables will not be added if the quality of education at the facility is deemed by the District to be compromised by either total school size, or impact upon core facilities such as lunch room/food services, restrooms, library space, hallways, or a severe reduction in playground area or parking area, etc. Portables are not intended to be a long-term capacity solution. The District regularly assesses the condition of its portables for continued educational program use.

Minimum Level of Service (MLOS)

The District will evaluate student housing levels based on the District as a whole system and not on a school by school or site by site basis. This may result in portable classrooms being used as interim housing, attendance boundary changes or other program changes to balance student housing across the system as a whole. A boundary change or a significant programmatic change would be made by the Board of Directors following appropriate public review and comment.

The District's minimum level of service is as follows: on average, K-5 classrooms have no more than 28 students per classroom, 6-8 classrooms have no more than 30 students per classroom, and 9-12 classrooms have no more than 32 students per classroom. The District has set minimum educational service standards based on several criteria. Exceeding these minimum standards will trigger significant changes in program delivery. Minimum standards have not been met if, on average using current FTE figures: K-5 classrooms have more than 28 students per classroom, 6-8 classrooms have more than 30 students per classroom, or 9-12 classrooms more than 32 students per classroom. For purposes of this determination, the term "classroom" does not include special education classrooms or special program classrooms (i.e. computer labs, art rooms, chorus and band rooms, spaces used for physical education and other special program areas). Furthermore, the term "classroom" does not apply to special programs or activities that may occur in a regular classroom. The minimum educational service standards are not District's desired or accepted operating standard.

For the school years of 2017-18 and 2018-19, the District's compliance with the minimum educational service standards was as follows:

Table 1 Minimum Level of Service

2017-18 School Year						
LOS Standard	MINIMUM LOS# Elementary	REPORTED LOS Elementary	MINIMUM LOS Middle	REPORTED LOS Middle	MINIMUM LOS High	REPORTED LOS High
	28	23.92	30	26.88	32	20.85

* The District determines the reported service level by adding the reported average of FTE students at each grade level and dividing that number by the number of general education teaching stations (including portables).

2018-19 School Year						
LOS Standard	MINIMUM LOS# Elementary	REPORTED LOS Elementary	MINIMUM LOS Middle	REPORTED LOS Middle	MINIMUM LOS High	REPORTED LOS High
	28	23.21	30	27.53	32	20.19

* The District determines the reported service level by adding the reported average of FTE students at each grade level and dividing that number by the number of general education teaching stations (including portables).

Section 4: Capital Facilities Inventory

CAPITAL FACILITIES

Under the GMA, public entities are required to inventory capital facilities used to serve existing development. The purpose of the facilities inventory is to establish a baseline for determining what facilities will be required to accommodate future demand (student enrollment) at acceptable or established levels of service. This section provides an inventory of capital facilities owned and operated by the Sultan School District including schools, portables, unimproved land and support facilities. Leased facilities are also identified. School facility capacity was inventoried based on the space required to accommodate the District's adopted educational program standards (see Section 3).

Permanent Classrooms

The District operates two elementary schools, one middle school, one high school, and an alternative high school for grades 9-12. Currently the elementary schools serve grades PreK-5, the middle school serves grades 6-8 and the high school serves grades 9-12. School capacity was determined based on the number of classrooms used as general education teaching stations at each school and the District's adopted standard of service. It is this capacity calculation that is used to establish the District's baseline capacity and to determine future capacity needs based on projected student enrollment. The school permanent capacity inventory is summarized in Table 2. Teaching stations that are not available for regular classroom capacity are used as conference room space, computer STEM labs, special education programs, occupational therapy rooms, behavior modification rooms, and special needs pre-school classrooms.

Portable Classrooms

Portable classrooms are used as interim classroom space to house students until funding can be secured to construct permanent classrooms. The Sultan School District currently owns 42 portable classrooms throughout the District to provide additional interim classroom capacity in addition to housing programs to address diverse students (see Table 3). Of the 42 portables listed in inventory, 19 are used as general education classrooms. The other 23 are used for programmatic offerings such as the alternative high school program, computer labs, STEM labs, Title I, Occupational Therapy, Special Education, preschool, and PTA.

Table 2 Permanent Classroom Capacity Inventory

Elementary School	Site Size (Acres)	Bldg Area (Square Feet)	Total Teaching Stations	Teaching Stations General Education	Student Classroom Capacity
Sultan Elementary 501 Date Ave, Sultan	9.00	52,661 sf	25	22	431
Gold Bar Elementary 419 Lewis Ave, Gold Bar	10.22	33,723 sf	14	13	255
TOTAL K-5	19.22	86,384 sf	39	35	686

Middle School	Site Size (Acres)	Bldg Area (Square Feet)	Total Teaching Stations	Teaching Stations General Education	Student Classroom Capacity
Sultan Middle School 301 High Ave, Sultan	9.4	66,912 sf	20	16	480
TOTAL 6-8	9.4	66,912 sf	20	16	480

High School	Site Size (Acres)	Bldg Area (Square Feet)	Total Teaching Stations	Teaching Stations General Education	Student Classroom Capacity
Sultan High School 13715 310 th Ave SE, Sultan	35.0	71,876 sf	18	14	448
TOTAL 9-12	35.0	71,876 sf	18	14	448

GRAND TOTAL		225,172 sf	77	65	1,614
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Table 3 Portable Classroom Capacity Inventory

Elementary School	Bldg Area (Square Feet)	Total Teaching Stations	Teaching Stations General Education	Student Classroom Capacity
Sultan Elementary	10,776 sf	12	5	98
Gold Bar Elementary	10,768 sf	10	4	78
TOTAL	21,544 sf	22	9	176

Middle School	Bldg Area (Square Feet)	Total Teaching Stations	Teaching Stations General Education	Student Classroom Capacity
Sultan Middle School	3,592 sf	5	2	60
TOTAL	3,592 sf	5	2	60

High School	Bldg Area (Square Feet)	Total Teaching Stations	Teaching Stations General Education	Student Classroom Capacity
Sultan High School	13,476 sf	13	8	200
TOTAL	13,476 sf	13	8	200

Alternative Program	Bldg Area (Square Feet)	Total Teaching Stations	Teaching Stations General Education	Student Classroom Capacity
Sky Valley Option High School	1,792 sf	2	0	0
TOTAL	1,792 sf	2	0	0

GRAND TOTAL	40,404 sf	42	19	436
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**Table 4 Classroom Capacity – Permanent and Temporary Inventory
Combined Total**

Elementary School	Permanent/ Temporary (Square Feet)	Total Teaching Stations	Teaching Stations General Education	Total Maximum Student Capacity
Sultan Elementary	63,437 sf	37	27	529
Gold Bar Elementary	44,491 sf	24	17	333
TOTAL K-5	107,928 sf	61	44	862

Middle School	Permanent/ Temporary (Square Feet)	Total Teaching Stations	Teaching Stations General Education	Total Maximum Student Capacity
Sultan Middle School	70,504 sf	25	18	540
TOTAL 6-8	70,504 sf	25	18	540

High School	Permanent/ Temporary (Square Feet)	Total Teaching Stations	Teaching Stations General Education	Total Maximum Student Capacity
Sultan High School	85,352 sf	31	22	648
TOTAL 9-12	85,352 sf	31	22	648

Alternative Program	Permanent/ Temporary (Square Feet)	Total Teaching Stations	Teaching Stations General Education	Student Classroom Capacity
Columbia Virtual Academy	1,792	2	0	0
TOTAL	1,792	2	0	0

GRAND TOTAL	265,576 sf	119	84	2,050
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Support Facilities

In addition to schools, the District owns and operates additional facilities that provide operational support functions to the schools. An inventory of these facilities is provided in Table 4.

Table 5 Support Facility Inventory

Facility	Building Area (Square Feet)
Administration	3,149
Bus Barn	7,200
TOTAL	10,349

Additional Land Inventory

The District recently sold a 40 acre undeveloped parcel on Reiter Road in Gold Bar, WA. The property was originally purchased for the construction of a new middle school, but was later determined to not be an ideal location to serve our student population. The District has purchased two new properties. One property, of 2.5 acres, is next to the High School and planned for potential expansion of that school, and the other, a 9.787 acre site, is at the south eastern edge of the City and planned for a future transportation co-op.

The District is actively looking for future school sites and has given consideration to the Rice Road area on the east side of Sultan, as well as the Woods Lake Road area just west of Sultan, off of Old Owen Road. Additional thought has been given to grade span reconfigurations and schools that are area specific to address the long term needs of the District. No decisions have been made at this time for land acquisition or conceptual drawings.

Leased Property/Facilities

The District is leasing the property formerly known as the “Start Up Gym” to the Sky Valley Arts Council. The property is identified by Parcel No. 27080400200100 and contains approximately 8.74 acres.

The District does not lease from any third party any facilities for District administration or facility use.

Section 5: Student Enrollment Projections

Student Enrollment Projections 2020 - 2025

Enrollment projections are the most accurate for the initial years of the forecast period. Moving further into the future, more assumptions about economic conditions and demographic trends in the area affect the projection. Any plans for new facilities can be delayed if enrollment projections and the economy indicate a downturn. It is much more difficult, however, to initiate new projects or speed projects up in the event enrollment growth exceeds the projections. The District plans to monitor closely actual enrollment and, if necessary, make appropriate adjustments in future Plan updates. For purposes of this update, the District reviewed three methods of projections:

1. ***The Office of Financial Management (OFM)*** “ratio method” is based upon Snohomish County population estimates for people residing within the Sultan School District Service Area (both within the corporate City limits of Sultan and Gold Bar as well as unincorporated parts of Snohomish County) compared to current Actual student enrollment. Between 2014 and 2019, the District’s enrollment averaged approximately 13.81% of the total population in the Sultan School District service area. Assuming that the District’s headcount enrollment will continue to increase in direct proportion with the Sultan School District service area population, a total enrollment of 2,151 students is projected for 2025. This is an increase of 170 students from actual 2019 enrollment, or an 8.58% increase. Using the OFM methodology, student enrollment is anticipated at 2,392 by 2035 when the Population Forecast of 17,322 residents in the Sultan School District Service Area is expected.
2. ***The Office of Superintendent of Public Instruction (OSPI)*** projections are based upon a “cohort” survival method which uses the “official” student count day of October 1st each year to establish historical enrollment data from the previous 5 years to create an average to forecast forward the number of students who will be attending school in the following years, also known as a Linear Projection. The cohort survival method is considered conservative given that it doesn’t account fully for in-migration due to growth. The cohort survival method uses a headcount analysis and includes students enrolled in non-brick and mortar programs in the District (such as the virtual academy and Running Start). Based on the OSPI “cohort” methodology, the District’s enrollment will increase in 2025 to 2,163 students, an increase of 9.2% over 2019 headcount enrollment. See Appendix A – page 1.
3. ***The District*** has developed its own methodology for forecasting future enrollments. This methodology, a modified cohort survival method, considers historic enrollment trends in the District and known data regarding local housing circumstances. In particular, the District is aware of approximately 200 new homes coming on line by the end of 2020 and an additional 631 homes in the permit pipeline expected by the end of 2022. The District’s enrollment projections start with actual 2019 enrollment and uses a monthly average to produce an annual enrollment number. The District uses this average to project forward in forecasting for budget purposes and to ensure adequate staffing levels to meet enrollment projections. The District’s methodology uses a full-time equivalent analysis instead of headcount to more accurately reflect the actual number of students in school buildings at a given time. In addition, the District’s methodology adjusts for the elimination of the enrollment in the virtual academy

following the 2018 school year. Based upon the District’s methodology, the District’s enrollment will increase by a total of 381 students by 2025, an increase of 19.23% from 2019 enrollment level. See Appendix A – page 2.

OFM, OSPI, and the District’s enrollment projections are reflected in Table 6.

Table 6 Enrollment Projections

								Projected Change	Percent Change
Method	2019^	2020	2021	2022	2023	2024	2025	2019-2025	2019-2025
OFM	1,981	2,009	2,037	2,065	2,093	2,121	2,151	170	8.58%
OSPI	1,981	2,022	2,048	2,092	2,109	2,153	2,163	182	9.20%
District	1,981	1,950	2,030	2,282	2,302	2,332	2,362	381	19.23%
Population Projections	14,522						15,572	1,050	7.23%
^October 1, 2017 actual enrolment.									

The Sultan School District has chosen to follow the District’s methodology during this planning period because that methodology more accurately reflects the anticipated growth based on historic patterns and expected new development based on updated information. The District intends to monitor enrollment data and make annual adjustments as needed. The District will revisit the enrollment methodology in future updates to the CFP.

Enrollment Projections - 2035

Student enrollment projections beyond 2025 are highly speculative. Using OFM/County data as a base, the District projects a 2035 student FTE population of 2,392. This is based on the OFM/County data and the District's corresponding 2019 enrollment figures. The total enrollment estimate was broken down by grade span to evaluate long-term needs for capital facilities. The grade span breakdown assumes that the proportion of students in each grade band will remain constant.

Projected enrollment by grade span for the year 2035 is provided in Table 7. Again, these estimates are highly speculative and are used only for general planning purposes.

Table 7 OFM Enrollment Projections from 2017 to 2035

Grade Span	Actual Enrollment – October 2019	Projected Enrollment 2035*
Elementary (K-5)	894	1,080
Middle School (6-8)	492	594
High School (9-12)	595	718
TOTAL (K-12)	1,981	2,392

Note: Snohomish County Planning and Development Service provided the underlying data for the 2035 projections.

Section 6: Capital Facility Needs

The projected available student capacity was determined by subtracting permanent capacity from actual 2019 enrollment and projected 2025 enrollment. Importantly, existing and planned portable capacity, which is a capacity solution, is not included in this analysis. Capacity needs are expressed in terms of “unhoused students.”

Table 8 Unhoused Students – Based on October 2019 Enrollment

Grade Span	Permanent Capacity	Enrollment	Available Capacity*	Unhoused Students
Elementary Level (K-5)	686	894	0	208
Middle Level (6-8)	480	492	0	12
High School Level (9-12)	448	595	0	147
TOTALS	1,614	1,981	0	367

*Permanent capacity only

Assuming no new capacity additions during the six year period, Table 9 identifies the additional permanent classroom capacity that will be needed in 2025, the end of the six year forecast period:

Table 9 Unhoused Students – Based on Projected October 2025 Enrollment

Grade Span	Permanent Capacity	Enrollment (FTE)	Available Capacity*	Unhoused Students	%age of Unhoused Students 2019-2025
Elementary Level (K-5)	686	1,118	0	432	51.9%
Middle Level (6-8)	480	582	0	102	88.2%
High School Level (9-12)	448	662	0	214	31.3%
TOTALS	1,614	2,362	0	748	50.9%

*Permanent capacity only

Table 9 demonstrates that projected growth through 2025 will impact the District’s facilities at all three grade levels.

Importantly, Table 9 does not include portable classroom additions or adjustments that could be made to meet capacity needs. For example, the portable classrooms currently located at the elementary school level could be used to serve middle school capacity needs.

Projected permanent capacity needs are depicted in Table 10. They are derived by applying the District’s projected number of students to the projected capacity. Planned improvements by the District through 2025 are included in Table 10 and more fully described in Table 11.

Table 10 Projected Student Capacity – 2019 through 2025**Elementary School -- Surplus/Deficiency**

	2019*	2020	2021	2022	2023	2024	2025
Existing Capacity	686	686	686	686	686	686	886
Added Permanent Capacity	0	0	0	0	0	200**	700+
Enrollment	894	927	964	1,080	1,090	1,104	1,118
Permanent Facilities Surplus/(Deficiency)^	(208)	(241)	(278)	(394)	(404)	(218)	468

* Actual Oct. 2019 FTE enrollment

** Classroom addition at Sultan Elementary School (100) and Gold Bar Elementary (100)

+ New Elementary School (700)

^Does not include capacity solutions with current and planned portable classrooms

Middle School Level -- Surplus/Deficiency

	2019*	2020	2021	2022	2023	2024	2025
Existing Capacity	480	480	480	480	480	570	570
Added Permanent Capacity	0	0	0	0	90**	0	0
Enrollment	492	487	506	564	568	575	582
Permanent Facilities Surplus/(Deficiency)^	(12)	(7)	(26)	(84)	2	(5)	(12)

* Actual Oct. 2019 FTE enrollment

** Classroom addition at Sultan Middle School

^ Does not include capacity solutions with in current portable classrooms

High School Level -- Surplus/Deficiency

	2019*	2020	2021	2022	2023	2024	2025
Existing Capacity	448	448	448	448	448	704	704
Added Permanent Capacity	0	0	0	0	256**	0	0
Enrollment	595	536	560	637	644	653	662
Permanent Facilities Surplus/(Deficiency)^	(147)	(88)	(112)	(189)	60	51	42

* Actual Oct. 2019 FTE enrollment

** Classroom addition at Sultan High School

^ Does not include capacity solutions with current and planned portable classrooms

Planned Improvements

Table 10 indicates that the District will need additional capacity at all grade levels to serve projected student enrollment. The District's Board of Directors adopted a resolution in November 2015 to place a bond measure on the February 2016 ballot. That measure, if approved, would have funded modernization and capacity expansion projects at all four district schools. The February 2016 bond measure did not receive the required 60% approval. The Board is considering review of a future resolution for projects similar to those presented in the February 2016 proposal. Future updates to this CFP will include updated information regarding any adopted bond resolution.

Projects Adding Permanent Capacity (subject to funding):

- a 100 seat expansion at Sultan Elementary School;
- a 100 seat expansion at Gold Bar Elementary School;
- a 90 seat expansion at Sultan Middle School;
- a 256 seat expansion at Sultan High School; and
- a new 700 student elementary school.

Non-Capacity Adding Projects (subject to funding):

- Modernization and improvements at all four campuses; and
- School athletic facilities improvements.

In the event that planned construction projects do not fully address space needs for student growth and a reduction in interim student housing, the Board could consider various courses of action, including, but not limited to:

- Alternative scheduling options;
- Changes in instructional model;
- Grade configuration changes;
- Increased class sizes; or
- Modified school calendar.

Funding for planned improvements is typically secured from a number of sources including voter approved bonds, State School Construction Assistance funds, and impact fees. The potential funding sources are discussed below.

Interim Classroom Facilities (Portables)

During the six years of this planning period, the District may purchase or lease portable classrooms and/or relocate portables if necessary to address growth needs. It remains a District goal to house all students in permanent facilities.

Section 7: Financial Plan

Funding of school facilities is typically secured from a number of sources including voter approved bonds, capital levies, State School Construction Assistance funds, and School Impact Fees. Each of these sources is discussed in greater detail below.

General Obligation Bonds

Bonds are typically used to fund construction of new schools and other capital improvement projects. A 60% voter approval is required to pass a bond. Bonds are then retired through collection of property taxes. General Obligation Bonds or Special Levies would be the primary source of funding for any future capital improvement projects.

State School Construction Assistance Program

State School Construction Assistance Program funds come from the Common School Construction Fund. The State deposits revenue from the sale of renewable resources from State school lands set aside by the Enabling Act of 1889 into the Common School Account. If these sources are insufficient to meet needs, the Legislature can appropriate General Obligation Bond funds or the Superintendent of Public Instruction can prioritize projects for funding. School districts may qualify for State School Construction Assistance Program funds for specific capital projects based on a prioritization system. The District anticipates that it will receive SCAP funds for the Sultan High school and Gold Bar Elementary School projects that are included in this CFP. The District is eligible for State School Construction Assistance funds for certain projects at the 62.74% funding percentage level.

School Impact Fees

Impact fees have been adopted by a number of jurisdictions as a means of supplementing traditional funding sources for construction of public facilities needed to accommodate new development. School impact fees are generally collected by the permitting agency at the time building permits are issued. Following a decline in enrollment in 2010, the District did not request school impact fees for several years. With recent and projected continued enrollment increases, as well as capacity planning to address these enrollment needs, the District began requesting school impact fees in 2016 and continues to do so in this Capital Facilities Plan.

Six-Year Financial Plan

The Six-Year Financial Plan shown in Table 11 is a summary of the expected budget that supports the projects in this Capital Facilities Plan. The financing components include possible funding from capital bonds and levies, school impact fees, and State Construction Assistance Funds (dependent upon qualifying, level of funding and availability of funds). Projects and portions of projects which remedy existing deficiencies are not appropriate for impact fee funding. Thus, impact fees will not be used to finance projects or portions of projects which do not add capacity or which remedy existing deficiencies.

The District expects that, as project and bond planning proceeds, the estimated project costs in Table 11 are likely to increase. Thus, the project cost estimates in this CFP should be viewed conservatively. Future updates to this CFP will include updated cost estimates.

Table 11 Finance Plan 2020-2025

Improvements Adding Permanent Capacity (Costs in Millions)

Project	2020	2021	2022	2023	2024	2025	Total Cost	Bonds/ Levy	State Funds	Impact Fees
Elementary School										
Sultan Elementary Addition					\$4.401		\$4.401	X		X
Gold Bar Elementary Addition					\$7.735		\$7.735	X	X	X
New Elementary (estimated future costs*)					\$20.000	\$5.000	\$25.000	X		X
Site Acquisition (New Elementary)							TBD	X		X
Middle School										
Sultan Middle Addition				\$1.396	\$1.000		\$2.396	X		X
High School										
Sultan High Addition				\$9.793	\$3.000		\$12.793	X	X	X
K-12										
Portables							TBD			X

Improvements Not Adding Permanent Capacity (Costs in Millions)

Project	2020	2021	2022	2023	2024	2025	Total Cost	Bonds/ Levy	State Funds	Impact Fees
Elementary School										
Sultan Elementary Modernization					\$3.601		\$3.601	X		
Gold Bar Elementary Modernization					\$12.099		\$12.099	X	X	
Middle School										
Sultan Middle Modernization				\$6.583	\$3.000		\$9.583	X		
High School										
Sultan High Modernization				\$34.537	\$20.000		\$54.537	X	X	

Total Permanent Improvements (Costs in Millions)

	2020	2021	2022	2023	2024	2025	Total Cost	Bonds/ Levy	State Funds	Impact Fees
TOTAL				\$52.309	\$74.836	\$5.0	\$132.145	X	X	X

**Estimated facility cost only; future site needed but land costs unknown at this time. Future updates to the CFP will include identified costs.*

Section 8: Impact Fees

Impact Fee Calculation Parameters

The GMA authorizes jurisdictions to collect impact fees to supplement funding of additional public facilities needed to accommodate new development. Impact fees cannot be used for the operation, maintenance, repair, alteration, or replacement of existing capital facilities used to meet existing service demands. Fees also cannot be used to make up for capacity deficiencies existing on the date of Plan adoption. Fees may only be assessed in relation to the new capacity needs created by new development.

The Snohomish County General Policy Plan (GPP) which implements the GMA, sets certain conditions for districts wishing to assess impact fees.

The District must provide support data including:

- (a) An explanation of the calculation methodology, including description of key variables and their computation; and
- (b) Definitions and sources of data for all inputs into the fee calculation.

Such data must be accurate, reliable and statistically valid;

Data must accurately reflect projected costs in the 6-year financing program;

Data in the proposed impact fee schedule must reflect expected student generation rates from the following residential unit types:

- 1. Single-family
- 2. Multi-family/ 2 or more bedrooms
- 3. Multi-family/studio or 1-bedroom;

In November 1997, Snohomish County substantially modified Title 26C to convert it into an impact fee program meeting new requirements of the GMA and changes to RCW 82.02, the State law authorizing impact fees. On February 1, 2003, Snohomish County adopted a revision of Title 26C, thus replacing it with Chapter 30.66C, as defined by the Uniform Development Code. The cities of Sultan and Gold Bar have adopted school impact fee ordinances consistent with the Snohomish County school impact fee ordinance.

Methodology and Variables Used to Calculate School Impact Fees

Impact fees are calculated utilizing the formula in the Snohomish County school impact fee ordinance. The resulting figures are based on the District's cost per dwelling unit to purchase land for school sites, make site improvements, construct schools, and purchase/install relocatable facilities that add interim capacity needed to serve new development. A student factor (or student generation rate) is used to identify the average cost per dwelling unit by measuring the average number of students generated by each housing type (single-family dwellings and multi-family dwellings of one bedroom and two bedrooms or more). A description of the student methodology is contained in Appendix B. As required under the GMA, credits are applied in the formula to account for State School Construction Assistance funds to be reimbursed to the District and projected future property taxes to be paid by the dwelling unit. The costs of projects that do not add capacity are not included in the impact fee calculations. Furthermore, because the impact fee formula calculates a "cost per dwelling unit," an identical fee is generated regardless of whether the total new capacity project costs are used in the calculation or whether the District uses only the percentage of the total new capacity project costs allocated to the Districts growth-related needs, as demonstrated in Table 9. For purposes of this Plan, the District has chosen to use the full project costs in the fee formula. Furthermore, impact fees will not be used to address existing deficiencies. See Table 11 for a complete identification of funding sources.

The following projects are included in the impact fee calculation:

- 100 student capacity additions at both Sultan and Gold Bar Elementary Schools;
- A new 700 student elementary school;
- 90 student capacity addition at Sultan Middle School; and
- 256 student capacity addition at Sultan High School.

Please see Table 11 for relevant cost data related to each capacity project.

Table 12 School Impact Fees

Housing Type	Impact Fee Per Unit
<i>Single Family Residential</i> (detached)	\$2,966
<i>Multi-Family (2+ bdrms)</i>	\$2,685
<i>Multi-Family (studio or 1 bdrm)</i>	\$0

**Table 10 reflects a 50% adjustment to the calculated fee as required by local ordinances.*

APPENDIX A



ICOS

School Facilities and Organization
 INFORMATION AND CONDITION OF SCHOOLS
 Enrollment Projections (Report 1049)

Snohomish/Sultan(31311)

Grade	--- ACTUAL ENROLLMENTS ON OCTOBER 1st ---						AVERAGE % SURVIVAL	--- PROJECTED ENROLLMENTS ---					
	2014	2015	2016	2017	2018	2019		2020	2021	2022	2023	2024	2025
Kindergarten	150	134	139	147	137	158		150	151	153	155	156	158
Grade 1	151	147	130	161	158	147	105.12%	166	158	159	161	163	164
Grade 2	150	158	154	129	147	154	99.47%	146	165	157	158	160	162
Grade 3	137	145	154	144	127	158	98.70%	152	144	163	155	156	158
Grade 4	144	145	161	159	151	125	104.67%	165	159	151	171	162	163
Grade 5	121	156	140	169	162	152	102.47%	128	169	163	155	175	166
Grade 6	145	143	164	142	173	170	106.40%	162	136	180	173	165	186
K-6 Sub-Total	998	1,028	1,042	1,051	1,055	1,064		1,069	1,082	1,126	1,128	1,137	1,157
Grade 7	148	153	144	169	141	178	102.28%	174	166	139	184	177	169
Grade 8	137	158	154	146	154	144	100.40%	179	175	167	140	185	178
7-8 Sub-Total	285	311	298	315	295	322		353	341	306	324	362	347
Grade 9	139	140	146	146	132	164	97.25%	140	174	170	162	136	180
Grade 10	142	137	150	151	148	142	103.61%	170	145	180	176	168	141
Grade 11	124	137	155	120	142	148	96.72%	137	164	140	174	170	162
Grade 12	176	138	151	146	123	141	103.49%	153	142	170	145	180	176
9-12 Sub-Total	581	552	602	563	545	595		600	625	660	657	654	659
DISTRICT K-12 TOTAL	1,864	1,891	1,942	1,929	1,895	1,981		2,022	2,048	2,092	2,109	2,153	2,163

Notes: Specific subtotalling on this report will be driven by District Grade spans.

**SULTAN SCHOOL DISTRICT
ENROLLMENT PROJECTIONS
2020-21 THRU 2025-26**

GRADE	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26
Full Day K	155.40	161.55	180.93	182.47	184.80	187.09
First	157.40	163.55	182.93	184.47	186.80	189.09
Second	161.40	167.55	186.93	188.47	190.80	193.09
Third	131.40	137.55	156.93	158.47	160.80	163.09
Fourth	154.40	160.55	179.93	181.47	183.80	186.09
Fifth	167.40	173.55	192.93	194.47	196.80	199.09
Sixth	168.40	174.55	193.93	195.47	197.80	200.09
Seventh	157.40	163.55	182.93	184.47	186.80	189.09
Eighth	161.40	167.55	186.93	188.47	190.80	193.09
Ninth	147.40	153.55	172.93	174.47	176.80	179.09
Tenth	155.40	161.55	180.93	182.47	184.80	187.09
Eleventh	127.40	133.55	152.93	154.47	156.80	159.09
Twelfth	105.40	111.55	130.93	132.47	134.80	137.09
TOTAL	1,950.20	2,030.15	2,282.09	2,302.11	2,332.40	2,362.17
FTE Change	79.95					
	FTE Change	251.94				
		FTE Change	20.02			
			FTE Change	30.29		
				FTE Change	29.77	
5 Year Total						411.97

APPENDIX B



DOYLE
CONSULTING

ENABLING SCHOOL DISTRICTS TO MANAGE AND USE STUDENT ASSESSMENT DATA

Student Generation Rate Study for the Sultan School District

4/3/20

This document describes the methodology used to calculate student generation rates (SGRs) for the Sultan School District, and provides results of the calculations.

SGRs were calculated for two types of residential construction: Single family detached, and multi-family with 2 or more bedrooms. Attached condominiums, townhouses and duplexes are included in the multi-family classification since they are not considered “detached”. Manufactured homes on owned land are included in the single family classification.

1. Electronic records were obtained from the Snohomish County Assessor’s Office containing data on all new construction within the Sultan School District from January 2012 through December 2018. As compiled by the County Assessor’s Office, this data included the address, building size, assessed value, and year built for new single and multi-family construction. The data was “cleaned up” by eliminating records which did not contain sufficient information to generate a match with the District’s student record data (i.e. incomplete addresses).
2. The District downloaded student records data into Microsoft Excel format. This data included the addresses and grade levels of all K-12 students attending the Sultan School District as of March 2020. Before proceeding, this data was reformatted and abbreviations were modified as required to provide consistency with the County Assessor’s data.

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3. **Single Family Rates:** The data on all new single family detached residential units in County Assessor's data were compared with the District's student record data, and the number of students at each grade level living in those units was determined. The records of 237 single family detached units were compared with data on 1,946 students registered in the District, and the following matches were found by grade level(s)*:

GRADE(S)	COUNT OF MATCHES	CALCULATED RATE
K	4	0.017
1	12	0.051
2	10	0.042
3	11	0.046
4	5	0.021
5	8	0.034
6	6	0.025
7	5	0.021
8	2	0.008
9	7	0.030
10	0	0.000
11	3	0.013
12	6	0.025
K-5	50	0.211
6-8	13	0.055
9-12	16	0.068
K-12	79	0.333

4. *Large Multi-Family Developments:* Snohomish County Assessor's data does not specifically indicate the number of units or bedrooms contained in large multi-family developments. Additional research was performed to obtain this information from specific parcel ID searches, and information provided by building management, when available. Information obtained included the number of 0-1 bedroom units, the number of 2+ bedroom units, and specific addresses of 0-1 bedroom units.

Small Multi-Family Developments: This method included all developments in the County Assessor's data containing four-plexes, tri-plexes, duplexes, condominiums and townhouses. This data contained information on the number of bedrooms for all townhouses and condominiums. Specific parcel ID searches were performed for duplex and larger units in cases where number of bedroom data was missing.

5. **Multi-Family 2+ BR Rates:** County Assessor data indicate that there were 2 duplexes (4 units) built within the District boundaries during the period of this study. No specific matches were made.

6. **Summary of Student Generation Rates*:**

	K-5	6-8	9-12	K-12
Single Family	.211	.055	.068	.333

*Calculated rates for grade level groups may not equal the sum of individual grade rates due to rounding.

Multi-Family 2+ BR Rates: As noted above, the District does not have a reliable data set for purposes of calculating student generation rates for Multi-Family 2+ bedroom units. Consistent with the methodology used in the 2016, 2017, and 2018 Sultan School District Capital Facilities Plans, the District has calculated Multi-Family 2+ BR student generation rates using the countywide average of the corresponding rates published in the 2018 capital facilities plans (the last County-adopted set of plans) of the other school districts in Snohomish County. The District compared these averages with the averaged based on the 2016 adopted capital facilities plans. These averages reflect recent development trends in Snohomish County which will likely influence any multi-family construction that occurs in the District in the near term. Additionally, King County has recognized countywide averages as a reasonable approach to calculating student generation rates when there is a lack of sufficient development data. See KCC 21A.06.1260.

The District is choosing to continue to apply the 2016 calculated average, which is lower at each grand band than the 2018 calculated average, as a conservative estimate of student generation from new Multi-Family 2+ bedroom units within the Sultan School District.

The resulting average student generation rates are as follows:

Multi-Family 2+ BR Rates	K-5	6-8	9-12
	0.142	0.064	0.073

Student generation rates were not calculated for multi-family dwelling units with one bedroom or less as current data is insufficient for purposes of calculating a countywide average in Snohomish County.

APPENDIX C

SCHOOL IMPACT FEE CALCULATIONS									
DISTRICT	Sultan School District								
YEAR	2020								
School Site Acquisition Cost:									
(((AcresxCost per Acre)/Facility Capacity)xStudent Generation Factor									
				Student	Student	Student			
	Facility	Cost/	Facility	Factor	Factor	Factor	Cost/	Cost/	Cost/
	Acreage	Acre	Capacity	SFR	MFR (1)	MFR (2+)	SFR	MFR (1)	MFR (2+)
Elementary	10.00	\$ -	900	0.211	0.000	0.142	\$0	\$0	\$0
Middle	20.00	\$ -	90	0.055	0.000	0.064	\$0	\$0	\$0
High	40.00	\$ -	256	0.068	0.000	0.073	\$0	\$0	\$0
						TOTAL	\$0	\$0	\$0
School Construction Cost:									
(((Facility Cost/Facility Capacity)xStudent Generation Factor)x(permanent/Total Sq Ft)									
				Student	Student	Student			
	%Perm/	Facility	Facility	Factor	Factor	Factor	Cost/	Cost/	Cost/
	Total Sq.Ft.	Cost	Capacity	SFR	MFR (1)	MFR (2+)	SFR	MFR (1)	MFR (2+)
Elementary	84.80%	\$ 37,135,984	900	0.211	0.000	0.142	\$7,383	\$0	\$4,969
Middle	84.80%	\$ 2,395,680	90	0.055	0.000	0.064	\$1,241	\$0	\$1,445
High	84.80%	\$ 12,792,624	256	0.068	0.000	0.073	\$2,882	\$0	\$3,093
						TOTAL	\$11,506	\$0	\$9,507
Temporary Facility Cost:									
(((Facility Cost/Facility Capacity)xStudent Generation Factor)x(Temporary/Total Square Feet)									
				Student	Student	Student	Cost/	Cost/	Cost/
	%Temp/	Facility	Facility	Factor	Factor	Factor	SFR	MFR (1)	MFR (2+)
	Total Sq.Ft.	Cost	Size	SFR	MFR (1)	MFR (2+)			
Elementary	15.20%	\$ -	25	0.211	0.000	0.142	\$0	\$0	\$0
Middle	15.20%	\$ -	30	0.055	0.000	0.064	\$0	\$0	\$0
High	15.20%	\$ -	32	0.068	0.000	0.073	\$0	\$0	\$0
						TOTAL	\$0	\$0	\$0
State School Construction Funding Assistance Credit:									
CCA X SPI Square Footage X District Funding Assistance % X Student Factor									
				Student	Student	Student			
	CCA	SPI	Funding	Factor	Factor	Factor	Cost/	Cost/	Cost/
		Footage	Asst %	SFR	MFR (1)	MFR (2+)	SFR	MFR (1)	MFR (2+)
Elementary	\$ 238.22	90	62.74%	0.211	0.000	0.142	\$2,838	\$0	\$1,910
Middle	\$ 238.22	108	0.00%	0.055	0.000	0.064	\$0	\$0	\$0
High	\$ 238.22	130	62.74%	0.068	0.000	0.073	\$1,321	\$0	\$1,418
						TOTAL	\$4,159	\$0	\$3,328
Tax Payment Credit:							SFR	MFR (1)	MFR (2+)
Average Assessed Value							\$311,979	\$125,314	\$178,051
Capital Bond Interest Rate							2.44%	2.44%	2.44%
Net Present Value of Average Dwelling							\$2,738,945	\$1,100,164	\$1,563,156
Years Amortized							10	10	10
Property Tax Levy Rate							\$0.52	\$0.52	\$0.52
	Present Value of Revenue Stream						\$1,415	\$568	\$807
	Fee Summary:			Single	Multi-	Multi-			
				Family	Family (1)	Family (2+)			
	Site Acquisition Costs			\$0	\$0	\$0			
	Permanent Facility Cost			\$11,506	\$0	\$9,507			
	Temporary Facility Cost			\$0	\$0	\$0			
	State SCFA Credit			(\$4,159)	\$0	(\$3,328)			
	Tax Payment Credit			(\$1,415)	(\$568)	(\$807)			
	FEE (AS CALCULATED)			\$5,932	(\$568)	\$5,371			
	Fee (AS DISCOUNTED)			\$2,966	\$0	\$2,685			